

Puget Sound Air Pollution Control Agency

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F A X

April 29, 1998

To: Ash Grove Cement

From: Fred Austin

Attn: Gerry Brown (623-5596)

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Here are the corrected Conditions. Although apparantly Jay had seen the March 18th letter it was in the central file and not in my NOC file.

I'll have permit typed as soon as possible.

TOTAL PAGES = 3

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RECOMMENDED APPROVAL CONDITIONS

3. This source is subject to Subpart A and F of 40 CFR Part 60.
4. PM-10 emissions from each baghouse except the main stack baghouse shall not exceed 0.005 grains/dscf over a twenty-four hour period. Ash Grove may demonstrate compliance with this condition by any of the following:
 - (a) Performing a PSAPCA approved source test according to EPA Method 5 or EPA Method 201A;
 - (b) Demonstrating no visible emissions for 15 consecutive seconds;
 - (c) Demonstrating no visible emissions for three consecutive minutes; or
 - (d) Repairing within 24 hours, any baghouse that has visible emissions for more than three consecutive minutes.

Compliance shall be determined for visible emissions using EPA Method 22. PSAPCA may require a source test for any baghouse that has sustained visible emissions, unless such emissions are unavoidable under WAC 173-400-107.

5. Except during startup and shutdown of the kiln, scheduled maintenance and for emissions considered unavoidable under WAC 173-400-107, emissions from the main baghouse shall not exceed the most stringent of PSD limits or the following limits:

- (a) Carbon monoxide (CO) shall not exceed 1049 ppm (parts per million) corrected to 10% oxygen (O_2) for an 8 hour average, and CO shall not exceed 2353 tons per year;
- (b) Nitrogen Oxides (NO_x) shall not exceed 700 ppm corrected to 10% O_2 for a 1-hour average, and NO_x shall not exceed 501 ppm corrected to 10% O_2 for a 24-hour average, and NO_x shall not exceed 1846 tons per year;
- (c) Sulfur Dioxide (SO_2) shall not exceed 180 ppm corrected to 10% O_2 for a 1-hr average, and 176 tpy;
- (d) Particulate Matter (PM) shall not exceed 10.6 pounds per hour and 46 tpy.

6. During startup and shutdown of the kiln, and during scheduled maintenance on the main baghouse, all of the emission limits stated in Condition 5 apply, except that emissions from the main stack shall not exceed the following limits:

- a. During preheat, the SO_2 emission limit for the main stack shall consist of compliance with the following work practices and fuel restrictions;

1. Only natural gas is used as fuel. Specific guidelines found in Appendix A shall be followed for heating a cold or warm kiln system and system conditioning after maintenance.
2. Sulfur rings shall be removed from the kiln prior to startup if the sulfur rings require the kiln to be shut down.

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3. Any shutdown of the kiln shall follow the normal rotation and cool down guideline in Appendix A to remove as much material from the kiln as possible without damaging system components.

b. After the introduction of feed to the kiln, SO₂ emissions from the main stack shall not exceed 200 ppm corrected to 10% O₂ for a one-hour average.

c. At the time during kiln startup, shutdown and scheduled maintenance, NO_x emissions shall not exceed 1000 ppm corrected to 10% O₂ for a one-hour average.

Appendix A to this Order defines the startup, shutdown and scheduled maintenance conditions under which these alternate limits apply.

7. Ash Grove shall monitor and report CO, NO_x, SO₂, and opacity from the main baghouse according to Article 12 of Regulation I. SO₂ emissions from the main stack shall be monitored at all times following the introduction of feed to the kiln.

8. This Order of Approval No. 7381 supersedes and cancels Order of Approval No. 5730 dated December 29, 1994.

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